

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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|-----------------------------------------------|----------|-------------------------------|
| IN RE: | : | CHAPTER 13 |
| CRAIG BRADLEY DEIMLER | : | |
| WILLIAM OLIVER FISHER-DEIMLER | : | CASE NO. 1:20-bk-00841 |
| aka William Oliver Fisher Deimler; fka | : | |
| William Oliver Fisher | : | |
| Debtors | : | |
| | : | |
| FORD MOTOR CREDIT CO, LLC, | : | |
| Movant | : | |
| | : | |
| v. | : | |
| | : | |
| CRAIG BRADLEY DEIMLER | : | |
| WILLIAM OLIVER FISHER-DEIMLER | : | |
| aka William Oliver Fisher Deimler; fka | : | |
| William Oliver Fisher, | : | |
| Respondents | : | |

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied that Movant is not adequately protected. Denied that the Debtors do not maintain the required insurance.
6. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtors are responsible for payment of attorney fees and costs are therefore denied.
7. Proof of amounts owed is demanded at trial and this paragraph is therefore denied.
8. Proof of default is demanded at trial and this paragraph is therefore denied, pending Debtors' review of payments made.

9. Proof of current value of collateral is demanded at trial and this paragraph is therefore denied.
9. (sic) Admitted.
10. Admitted.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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